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February 4, 2010

Marlene H. Dortch
Secretary
Federal Communications Commission
445-12th Street, SW
Suite TW-A325
Washington, DC 20554

RE: **EB Docket No. 06-36**
Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2010
VIP Communications, Inc.

Dear Ms. Dortch:

Herewith transmitted, on behalf of VIP Communications, Inc., is its 2009 CPNI Certification and Accompanying Statement for filing in the above-referenced docket.

In the even there are any questions in connection with this filing, please communicate with the undersigned.

Very truly yours,



Peter M. Connolly

Enclosures

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Annual 47 C.F.R. § 2009(e) CPNI Certification

EB Docket 06-36

Annual § 64.2009(c) Certification for 2009

Date filed: February 4, 2010

Name of company covered by this certification: VIP Communications, Inc.

Form 499 Filer ID: 821408

Name of signatory: Graham Milne

Title of signatory: President

I, Graham Milne, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with this Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

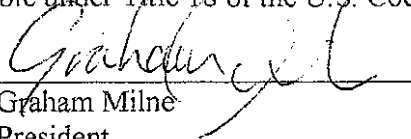
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (i.e. proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed


Graham Milne

President

VIP Communications, Inc.

**VIP Communications, Inc. policy for the protection and handling of Customer
Proprietary Network Information (CPNI)**

1. Safeguarding CPNI

VIP Communications, Inc. (VIP) recognizes the importance and legal obligation of safeguarding CPNI information.

- 1.1 All customers are required to establish a customer password, password hint and two security questions when establishing an account with VIP.
- 1.2 If a customer fails to enter their correct password when trying to access their VIP account online, they are prompted to either use our password recovery system or call customer service for assistance.
- 1.3 If they select to use the password recovery system, they are required to enter their account number or their name and registered telephone number. They can then opt to reset their password. An account password is then automatically reset to a temporary password and an email confirming the new temporary password is sent to the email we have on record for the account.
- 1.4 If a customer is unable to recall their password when calling to the VIP customer services center, the customer service representative (CSR) gives the customer their password hint. If the customer is still unable to verify their password correctly, the CSR informs the customer that they are unable to provide any assistance to them on the inbound call, but they will call them back on a number already existing in their VIP account details.
- 1.5 The CSR calls to the customer back on the appropriate telephone number from the account details, and asks the customer to answer the two security questions previously saved in the account by the customer.
- 1.6 If the customer is able to satisfy the requirements of 1.5, the CSR must request a new password and password hint from the customer. The CSR can then continue to provide service as required to the customer.
- 1.7 If the customer is unable to satisfy the requirements of 1.5, the CSR cannot provide any further assistance to the customer and informs them that VIP will have to reset their password and will notify them of the new password by mail, at the address on the account.
- 1.8 Under no circumstance does the CSR change the account address or any other information on the account if the requirements of 1.5 are not satisfied.
- 1.9 VIP will generate a temporary password and mail out notice of the same to the address on the account.

2. Acceptable Use of CPNI

- 2.1. VIP restricts its use of CPNI for the purposes of:
 - a. Providing customers with account support information such as rate change information (rate change subscription).
 - b. Providing customers with offers and promotional information specific to their current VIP service offering (current service subscription).
 - c. Provide customers with offers and promotional information specific to other VIP service offerings (other service subscription)
 - d. Providing customers with offers and promotional information specific to products and service offerings of VIP's affiliates (affiliate promotional subscription).
- 2.2. VIP currently shares CPNI with its affiliate, Global Reach Communications.
- 2.3. All existing customers have been provided with an opt-out or opt-in notification in a form and manner appropriate with FCC regulations governing CPNI (section 64.2001 – 64.2009)
- 2.4. All new customers are provided with an opt-out or opt-in notification in a form and manner appropriate with FCC regulations governing CPNI (section 64.2001 – 64.2009)
- 2.5. VIP maintains a complete record for a minimum of one year of all marketing campaigns for which CPNI is used.
- 2.6. VIP maintains a complete record for a minimum of one year of all disclosures or provisions of CPNI to any third party.
- 2.7. All use of CPNI, whether internal or external, must receive supervisory review and approval from a VIP Vice President or higher. A record of such reviews is maintained for a period of at least one year.

3. Customer Subscription Options (Opt-in and Opt-out)

- 3.1. VIP provides every customer with the option to opt-out of all email subscription services when opening a new VIP account.
- 3.2. VIP provides a click through link on every email sent that allows a customer to opt-out of any subscription.
- 3.3. Customers can opt-out of any subscription service by logging into their VIP account online or by calling the VIP customer service center.
- 3.4. Customer can opt-in to any subscription service by logging into their VIP account online. Customers cannot opt-in by calling VIP customer service.
- 3.5. VIP maintains a record of all changes to a customer's subscriptions for a period of at least one year. Such records included the date and time of the change and the method of the change (online or through customer service).

4. Employee Training and Disciplinary Procedures

- 4.1. VIP ensures that all employees who have access to CPNI are trained on the procedures laid out in this policy document.
- 4.2. VIP will issue a written warning to any employee who breaches these procedures. If an employee breaches these policies a second time, their employment with VIP will be terminated.

5. Actions in the Case of a Breach in CPNI Procedures

- 5.1. In the case of breach of these CPNI procedures, VIP will firstly act to protect against continued breach.
- 5.2. VIP will notify law enforcement of any breach as soon as possible but not later than seven business days following the breach.
- 5.3. Unless otherwise directed by the relevant investigating agency, VIP will not notify customers or any other party of the breach until seven business days have elapsed following the notification to law enforcement.
- 5.4. Records of all breaches will be maintained by VIP for a minimum of two years.